

RCRA RECORDS CENTER CIRCULATION AND UPDATE FORM

FACILITY NAME Bolling Air Force Base
 EPA ID NUMBER DC9570090036 FACILITY TYPE LQG DATE 7-23-99
 YOUR NAME / EXTENSION Andy Clibanoff / 83391 CHECK-OUT _____ UPDATE X

PLEASE MARK THE APPROPRIATE BOXES FOR UPDATES AND CHECK-OUTS

RCRA PERMITTING

- ☐ File Folder A
- ☒ Notification
☒ Corresp. and Part A Supp. Doc.
☒ Part A Permit Application
☒ Draft Part B Permit
☒ Public Notice/Hearing
☒ Part B Final Determination

RCRA PERMITTING

- ☐ File Folder B
- ☒ Part B Permit Correspondence
☒ Part B Permit Application
☒ Other (Waiver Req., EIR, etc.)

RCRA PERMITTING

- ☐ File Folder C
- ☒ Closure Plans
☒ Post Closure Plans

RCRA PERMITTING

- ☐ File Folder D
- ☒ Closure Notification
☒ Closure/Post Closure Corresp.
☒ Closure Certification
☒ Post Closure Permit Appl.
☒ Post Closure Permit
☒ Financial Assurance Doc.

COMPLIANCE AND ENFORCEMENT

- ☐ File Folder E
- ☒ Insp. Rpts./Compl. Monitoring
☒ Notices of Violation

COMPLIANCE AND ENFORCEMENT

- ☐ File Folder F
- ☒ 3008(a) Actions and Supp. Doc.
☒ 3013 Actions and Supp. Doc.
☒ Penalty Calculations
☒ Compliance Schedules
☒ 7003 Actions and Supp. Doc.
☒ Correspondence

COMPLIANCE AND ENFORCEMENT

- ☐ File Folder G
- ☒ Tech. Support Doc./Referrals

CORRECTIVE ACTION/ FACILITY INVESTIGATION

- ☐ File Folder H
- ☒ Background Rpts. and Studies
☒ RFA Report and Workplan

CORRECTIVE ACTION/ FACILITY INVESTIGATION

- ☐ File Folder I
- ☒ RFI Workplans
☒ RFI Prog. Rpts. and Oversight
☒ RFA, RFI Correspondence

CORRECTIVE ACTION/ FACILITY INVESTIGATION

- ☐ File Folder J
- ☒ RFI Final Report

CORRECTIVE ACTION/ FACILITY REMEDIATION

- ☐ File Folder K
- ☒ Interim Measures
☒ CMS Workplan

CORRECTIVE ACTION/ FACILITY REMEDIATION

- ☐ File Folder L
- ☒ CMS Final Report

CORRECTIVE ACTION/ FACILITY REMEDIATION

- ☐ File Folder M
- ☒ CMI Workplan
☒ CMI Prog. Rpts. and Oversight
☒ CMS, CMI Correspondence

CORRECTIVE ACTION/ FACILITY REMEDIATION

- ☐ File Folder N
- ☒ CMI Final Report

CORRECTIVE ACTION/ ENFORCEMENT

- ☐ File Folder P
- ☒ Draft 3008(h) Orde/Negotiations
☒ Signed 3008(h) Order
☒ Technical Support Documents
☒ Referral
☒ Miscellaneous Correspondence

CORRECTIVE ACTION/ PERMITTING

- ☐ File Folder Q
- ☒ Permit Correspondence
☒ Draft/Final Determination
☒ Corrective Action Permit

IMAGERY/SPECIAL STUDIES

- ☐ File Folder R

PUBLIC PARTICIPATION

- ☐ File Folder S
- ☒ Community Relations Plan
☒ Fact Shts., Press Rel., Public Not.
☒ Corr. w/Pub., Pub. Mtg. Not., Res. to Com.
☒ IAG Corr. and Mtg. Notes
☒ Newspaper Articles
☒ Congressional Requests and Response

COMBUSTION UNITS/INTERIM STATUS

- ☐ File Folder T
- ☒ Forms
☒ Correspondence
☒ Compliance Test Notification
☒ Compliance Certification
☒ Continuous Emissions Monitoring Report
☒ Air Modeling Data
☒ Other Supporting Documents

COMBUSTION UNITS/PERMITTING

- ☐ File Folder U
- ☒ Part B Permit Application
☒ Trial Burn Plans/Reports
☒ Correspondence/Reviews
☒ Draft Permit (or Denial)
☒ Final Determination

COMBUSTION UNITS/COMPLIANCE AND ENFORCEMENT

- ☐ File Folder V
- ☒ Inspection Report
☒ Compliance Monitoring
☒ Enforcement Documents
☒ Correspondence

RECORDS CENTER STAFF USE

_____ Date Checked Out
 _____ Date Updated/Added
 _____ Date Returned
 _____ Records Center
 _____ Employee Initials

☐ Entire File (For Non-TSD Files Only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

APRIL 21, 1999

**Colonel Duane Deal
11th Wing Commander
Bolling Air Force Base
370 Brookley Avenue
Washington, DC 20332-5403**

**Re: Bolling Air Force Base
EPA ID No. DC9570090036**

Dear Col. Deal:

The U.S. Environmental Protection Agency ("EPA"), Region III received your April 9, 1999 correspondence which addressed the violation and areas of concern cited in the EPA Notice of Violation (NOV) issued to Bolling Air Force Base on March 16, 1999. Based on your response to the NOV, EPA has concluded that Bolling Air Force Base is no longer in violation of the hazardous waste container labeling requirements as identified during a Compliance Evaluation Inspection (CEI) conducted by EPA and the District of Columbia Department of Health, Environmental Health Administration ("DCEHA") on May 4, 1998. EPA has also determined, based upon your April 9, 1999 correspondence, that Bolling Air Force Base has adequately addressed the additional areas of concern documented in the CEI report for the May 4, 1998 inspection and subsequent NOV.

This office is available to assist you in your efforts to remain in compliance with all applicable federal regulations. If you have any questions or comments call Andrew Clibanoff of my staff at (215) 814-3391.

Sincerely,

Harry T. Daw, Chief
RCRA Compliance and Enforcement Branch

cc: Andrew Clibanoff, EPA ✓
Jim Sweeney, DCEHA



DEPARTMENT OF THE AIR FORCE

11TH WING

Rec'd 4/16/99
AC



9 APR 1999

Colonel Duane W. Deal
HQ 11 WG/CC
20 MacDill Boulevard Suite 300
Bolling AFB DC 20332-0101

Mr. Andrew Clibanoff
USEPA, Region III
RCRA Compliance and Enforcement Branch (3WC31)
1650 Arch Street
Philadelphia PA 19103-2029

Dear Mr. Clibanoff

This is in response to the May 4, 1998, Compliance Evaluation Inspection, Notice of Violation (NOV), ID No. DC9 570 090 036, received at Bolling AFB on 24 March 1999. The purpose of this letter is to document the steps taken to quickly achieve compliance with the alleged violations and to address the areas of concern. The actions to resolve the alleged violations are complete. Some aspects of the actions, such as training and inspections, are part of a routine and continuous process.

Bolling AFB corrected the labeling and dating violation for the following containers:

- Clean-up material from battery acid spill, located at the storage site adjacent to building 518.
- The film at the Defense Intelligence Agency Center (DIAC) storage site.

The containers were labeled and dated at the time of inspection. The waste containers in question were shipped off-site for disposal on 2 June 1998.

Additionally, Bolling AFB completed corrections to the four areas of concern. In the order listed in your correspondence:

- The containment area drain valve at building 518 storage area was closed on the day of inspection. This valve has been fitted with a locking device, and is routinely inspected to ensure it is closed.
- Inspections of hazardous waste container storage areas are being documented weekly.

Freedom through Air Power

- A contractor charged the fire suppression system in the safety storage area for building 362 within a month after the inspection.
- The exhaust fans in the safety storage for buildings 18 and 362 have been reverified as operable.

Other actions that BAFB has completed include refresher training for the accumulation point managers, and training of new managers whenever there is a change in personnel. Furthermore, since receiving the notice, we have increased our inspections and begun verifications that the hazardous waste processes currently in place are in compliance with the EPA and District of Columbia rules and regulations.

Should you have any questions or concerns about hazardous waste management at Bolling AFB, we would be pleased to discuss them with you. Also, you may contact Mr. Peter Drottter directly at (202) 404-7003 or (202) 767-8601; he is the new Acting Chief of our Environmental Office.

We look forward to working with you in the future.

Sincerely



DUANE W. DEAL, Colonel, USAF
Commander

cc:

Mr. James N. Webb, USEPA, Region III
Mr. Jim Sweeney, DC Environmental Health
Administration (DCEHA)
Ms. Janice Shipley, DIAC
HQ USAF/ILEV
Mr. David Brentzel, AFCEE/CCR-A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MARCH 16, 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Colonel Duane Deal
11th Wing Commander
Bolling Air Force Base
370 Brookley Avenue
Washington, DC 20332-5403

Re: Notice of Violation
Compliance Evaluation Inspection
May 4, 1998
EPA ID No. DC9570090036

Dear Col. Deal:

On May 4, 1998, the U.S. Environmental Protection Agency ("EPA"), Region III conducted a joint Compliance Evaluation Inspection ("CEI") of your facility with the District of Columbia Department of Health, Environmental Health Administration ("DCEHA") under Chapter 40, 20 District of Columbia Municipal Regulations ("DCMR") "Hazardous Waste Management Regulations" and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. Based on that inspection and/or review of other pertinent information, EPA has determined that Bolling Air Force Base ("Bolling") is violating certain regulations promulgated under RCRA. As a result of this finding the Agency is issuing this **Notice of Violation (NOV)**.

The specific violation(s) are:

1. 40 CFR. § 262.34(a)(2) and 40 CFR. § 262.34(a)(3) state that a small quantity generator may store hazardous waste in containers on site for up to 180 days without a permit or interim status provided that 1) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and 2) while being accumulated on-site, each container is labeled or marked clearly with the words "Hazardous Waste." During the May 4, 1998 CEI, the EPA inspector observed one container of acidic waste from a battery spill

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clean-up located in the storage area adjacent to Building No. 518 that was neither labeled nor dated. The EPA inspector also observed seven boxes of old film that reportedly contained cadmium levels at hazardous concentrations which were not labeled or dated. Failure to manage wastes per 40 C.F.R. § 262.34(a)(2) and 40 C.F.R. § 262.34(a)(2) constitutes a violation of the Resource Conservation and Recovery Act.

In addition to the violation cited above, EPA also noted several areas of concern during the May 4, 1998 inspection. You should be aware that DCEHA's current hazardous waste management regulations are more stringent than the regulations delegated to the Administration by EPA. In fact, Bolling is considered to be a large quantity generator of hazardous waste under DCEHA's current regulations because your facility generates greater than 100 kilograms of hazardous waste per month. The EPA inspector found several instances in which Bolling may be in violation of DCEHA's current regulation. While these regulations are generally not federally enforceable, DCEHA does have the authority to administer all of its current regulations. The areas of concern are as follows:

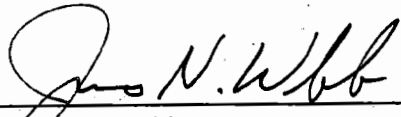
1. A containment area drain for a storage area at Building 518 was found to be open. The open drain is an apparent violation of Chapter 40, 20 DCMR §4402.2 which states that facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
2. Hazardous waste accumulation area inspections are documented quarterly, although a facility representative stated that visual inspections are conducted on an informal basis, but at least weekly. Chapter 40, 20 DCMR §4408.7 requires weekly inspections of areas where containers are stored. Bolling should document that inspections of hazardous waste container storage areas are conducted weekly.
3. The fire suppressant in the safety storage building (No. 362) was not charged at the time of the inspection. This is an apparent violation of Chapter 40, 20 DCMR §4402.4 which states that fire protection equipment shall be tested and maintained as necessary to assure its proper operation in time of emergency.
4. The EPA inspector also noted that exhaust fans were inoperable at Building Nos. 18 and 362.

A copy of the Inspection Report, documenting the findings of the inspector, is enclosed for your information.

Within thirty (30) calendar days of the receipt of this NOV, please submit documentation of any measures Bolling has taken or is taking to achieve compliance with the violation(s) and/or areas of concern noted above. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed. Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$27,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. The response to this NOV shall be addressed to:

Andrew Clibanoff, Environmental Engineer
U.S. Environmental Protection Agency - Region III
RCRA Compliance and Enforcement Branch (3WC31)
1650 Arch Street
Philadelphia, Pennsylvania 19103



James N. Webb
Associate Division Director
Office of Enforcement
Waste and Chemicals Management Division

3-15-99

Date

Enclosure

cc: Andrew Clibanoff, EPA Region III ✓
Jim Sweeney, DCEHA